



January 7, 2019

VIA ECF

Adam Saravay  
Partner  
T. 973-639-2023  
F. 973-297-3749  
asaravay@mccarter.com

Hon. Leda Dunn Wettre, U.S.M.J.  
United States District Court for the District of New Jersey  
Martin Luther King, Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

Re: Erin Henderson v. New York Jets, LLC  
Civil Action No. 2:17-cv-10110 (SDW) (LDW)

McCarter & English, LLP  
Four Gateway Center  
100 Mulberry Street  
Newark, NJ 07102-4056  
T. 973.622.4444  
F. 973.624.7070  
www.mccarter.com

Dear Judge Wettre:

This letter is submitted on behalf of defendant, New York Jets, LLC, to report on the status of the case in anticipation of the status conference call scheduled for January 9, 2019 at 3:00 p.m.

The parties have begun the depositions of the plaintiff and of the team consulting psychiatrist who treated and evaluated the plaintiff during his time as an employee of the team. The parties need to schedule dates to complete those depositions. The parties are in the process of scheduling of the other depositions of fact witnesses.

On January 2, 2019, plaintiff's counsel served a 35-page, single spaced expert report. The original deadline for plaintiff's expert reports was September 14, 2018; at plaintiff's counsel's request, that deadline was extended to December 2, 2018. Defendant's counsel has asked plaintiff's counsel to explain why the report, dated August 15, 2018, was not served by either the original deadline or by the extended deadline. Plaintiff's counsel has said that he thought he had served the report in October. We are considering our response to the service of this report 30 days after the extended deadline for plaintiff's expert reports.

Respectfully submitted,

/s/Adam Saravay

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